

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: KEVIN HUDSON KEMP  
Debtor**

**CHAPTER 12  
CASE NO. 20-00655-NPO**

**NOTICE**

NOTICE IS HEREBY GIVEN that counsel for the Debtor herein has filed its *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the “Application”), a copy of which Application is attached hereto as Exhibit “A”.

PLEASE TAKE FURTHER NOTICE that all creditors and parties-in-interest wishing to object to the Application must file a written objection or other responsive pleading within twenty-one (21) days from and after the date of this Notice, with the Clerk of the Court, Mr. Danny L. Miller, the Clerk of the U. S. Bankruptcy Court, Southern District of Mississippi, Thad Cochran United States Courthouse, 501 East Court Street, Jackson, MS 39201, and a copy of any objection must be served upon Craig M. Geno, Esq., Law Offices of Craig M. Geno, PLLC, counsel for the Debtor, at 587 Highland Colony Parkway, Ridgeland, MS 39157. Attorneys and other registered users of the Case Management/Electronic Case Filing (CM/ECF) system shall file any such obligation electronically. In the event an objection to this Application is filed, it will be scheduled for hearing in due course.

SO NOTICED this the 30<sup>th</sup> day of October, 2020.

Respectfully submitted,

KEVIN HUDSON KEMP

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:   
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway  
Ridgeland, MS 39157  
601-427-0048 - Telephone  
601-427-0050 - Facsimile  
[cmgeno@cmgenolaw.com](mailto:cmgeno@cmgenolaw.com)

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: KEVIN HUDSON KEMP  
Debtor**

**CHAPTER 12  
CASE NO. 20-00655-NPO**

**FIRST APPLICATION FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF NECESSARY EXPENSES  
FOR THE LAW OFFICES OF CRAIG M. GENO, PLLC**

COMES NOW the Law Offices of Craig M. Geno, PLLC (the “Applicant”), and files this its *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the “Application”), and in support thereof would show unto the Court the following, to-wit:

1. On February 25, 2020, the Debtor herein filed with this Court his original petition under Chapter 12 of the Bankruptcy Code.
2. On April 13, 2020, an Order [DK #48] approving the employment of the Applicant, as attorneys for the Debtor was entered by the Court.
3. The substantial services rendered to the Debtor and the expenses incurred by Applicant benefitted the estate. An Affidavit reflecting said legal services rendered and expenses incurred is attached hereto as Exhibit “A”. The Affidavit also certifies and represents to the Court that the services rendered to the Debtor were reasonable and necessary and that said services have actually been rendered. A detailed itemization of such services and expenses is attached as Exhibit “B” and incorporated by reference.
4. The fees and expenses charged and incurred represent reasonable and necessary fees and expenses that were required to be extended by Applicant to the Debtor in all matters which are anticipated to arise in the functioning of litigation matters, case administration and to protect and preserve all rights of the Debtor and the interests of creditors in furtherance of the counsel’s

**EXHIBIT “A”**

obligations herein; and they represent normal and customary fees and expenses incurred and charged for representation of debtors in similar cases. The time, skill and experience utilized by counsel for the Debtor justify the approval of the Application.

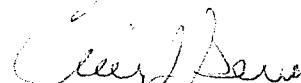
5. This is the Applicant's first request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from January 30, 2020, to and including October 29, 2020, and is for the sum of \$28,345.02 (\$27,881.00 in fees and \$464.02 in expenses), less any retainer balance remaining.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys' fees for the professional services rendered herein and authorizing and directing the Debtor to pay said attorneys' fees and expenses. Applicant prays for general relief.

THIS, the 30<sup>th</sup> day of October, 2020.

Respectfully submitted,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:   
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway  
Ridgeland, MS 39157  
601-427-0048 - Telephone  
601-427-0050 - Facsimile  
[cmgeno@cmgenolaw.com](mailto:cmgeno@cmgenolaw.com)

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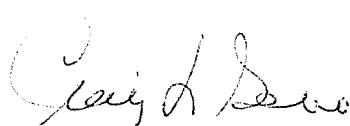
**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to the following:

Harold J. Barkley, Jr., Esq.  
hjb@hbarkley13.com

Christopher J. Steiskal, Esq.  
christopher.j.steiskal@usdoj.gov

THIS the 30 day of October, 2020.

  
\_\_\_\_\_  
Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: KEVIN HUDSON KEMP  
Debtor**

**CHAPTER 12  
CASE NO. 20-00655-NPO**

**EXHIBIT “A”**

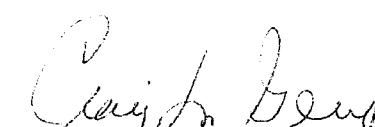
IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: KEVIN HUDSON KEMP  
Debtor

CHAPTER 12  
CASE NO. 20-00655-NPO

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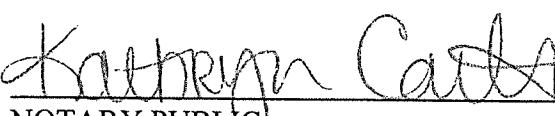
PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno, one of the attorneys for the Debtor, who after having been first by me duly sworn, stated on oath that this Affidavit is submitted in support of the First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC (the "Application"), Debtor's counsel, that the statements which are attached to the Application as Exhibit "B" represent a detailed statement of reasonable fees and expenses. Affiant hereby makes application for payment of reasonable attorney's fees and necessary expenses.

  
\_\_\_\_\_  
Craig M. Geno

STATE OF MISSISSIPPI  
COUNTY OF Hinds

SWORN TO AND SUBSCRIBED BEFORE ME, this the 30<sup>th</sup> day of October, 2020.



  
\_\_\_\_\_  
NOTARY PUBLIC

MY COMMISSION EXPIRES JUNE 21, 2021

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: KEVIN HUDSON KEMP  
Debtor

CHAPTER 12  
CASE NO. 20-00655-NPO

Law Offices of Craig M. Geno, PLLC  
587 Highland Colony Parkway  
Ridgeland, MS-Mississippi 39157 USA

Ph:601-427-0048 Fax:601-427-0050

Kevin Kemp  
MS-Mississippi  
USA

October 29, 2020

File #: 320006  
Inv #: 347453

Attention:

RE: Chapter 12

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Jan-30-20	Conference with Mr. Kemp regarding Chapter 12 issues, outline of Chapter 12	1.15	431.25	CMG
Jan-31-20	Assist CMG setting up file, drafting Petition, New Client Data Sheet	0.30	55.50	KLC
Feb-10-20	Meeting with Kevin Kemp re Schedules, SOFA	1.40	259.00	KLC
Feb-19-20	Conference with client regarding Chapter 12, schedules and debt	1.10	412.50	CMG
	Assist CMG drafting Schedules, SOFA, Matrix, Meeting with Kevin Kemp re same, perform UCC Search	3.20	592.00	KLC
Feb-21-20	Assist CMG drafting Schedules, SOFA, Matrix	0.70	129.50	KLC
Feb-25-20	Final review and revision of initial papers to file Chapter 12	0.20	75.00	CMG
	Assist CMG drafting and revising Schedules, SOFA	1.00	185.00	KLC
Feb-27-20	Review Honda Proof of Claim	0.20	75.00	CMG
	Review deficiency regarding Schedules	0.20	75.00	CMG

**EXHIBIT "B"**

Invoice #:	347453	Page 2	October 29, 2020			Invoice #:	347453	Page 3	October 29, 2020		
		Review deficiency notice for Plan	0.10	37.50	CMG	Mar-17-20		Telephone conference with client regarding financing	0.20	75.00	CMG
		Review Notice of Deficiency regarding Petition	0.10	37.50	CMG			Review Wells Fargo Proof of Claim	0.25	93.75	CMG
		Receipt and review of Deficiency Notice; calendar deadline to file Plan and reminders	0.10	18.50	KLC	Mar-18-20		Review Santander Proof of Claim	0.25	93.75	CMG
		Receipt and review of Deficiency Notice; calendar deadline to file Schedules, SOFA, Attorney Disclosure Statement	0.10	18.50	KLC	Mar-19-20		Conference with Katie Carter, dictation of "renotices" and Certificates of Service to include Harold Barkley for service of Application to Employ	0.25	93.75	CMG
Feb-29-20		Review Notice from Wells Fargo	0.20	75.00	CMG			Assist CMG drafting Certificate of Service re Application to Employ CMG to send to Harold Barkley	0.10	18.50	KLC
Mar-02-20		Dictation of Rule 2016 (b) statement	0.10	37.50	CMG	Mar-20-20		Update/preparation of document management control (subfiles and pleadings)	0.50	92.50	SLP
		Dictation of Application to Employ, review and revision of same, Notice and Certificate of Service, Order	0.75	281.25	CMG	Mar-23-20		Assist CMG drafting Motion to Incur Debt, Notice, Certificate of Service and Order re same	0.30	55.50	KLC
		Assist CMG drafting Attorney Disclosure Statement, Application to Employ CMG, Notice, Certificate of Service and Order re same	0.20	37.00	KLC	Mar-24-20		Review and revision of 365 Motion	0.35	131.25	CMG
		Organize and supervise mailout of Application to Employ CMG	0.30	55.50	KLC			Dictation of Motion Order to Expedite	0.30	112.50	CMG
Mar-05-20		Review letter from Kubota; dictation of letter to client regarding Kubota condition of collateral; insurance	0.20	75.00	CMG			Review Notice of Hearing	0.20	75.00	CMG
Mar-06-20		Review memos to/from J. Rawlings regarding Adversary Proceeding and basic facts of case/loan	0.20	75.00	CMG			Assist CMG revising Emergency Motion to Incur Debt and Order re same	0.10	18.50	KLC
Mar-10-20		Dictation of Motion/Order regarding Schedule filing; review and revision of same	0.35	131.25	CMG	Mar-26-20		Assist CMG drafting and revising Motion to Expedite Hearing re Emergency Motion to Incur Debt and Order re same	0.30	55.50	KLC
		Assist CMG drafting Motion to Extend Time to File Required Documents and Order re same	0.20	37.00	KLC			Receipt and review of Notice of Hearing and Deadlines re Emergency Motion to Incur Debt; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	56.25	CMG
Mar-13-20		Receipt and review of Order on Motion to Extend Time to File Required Documents; calendar deadline to file Schedules, SOFA	0.10	18.50	KLC			Dictation of Notice/ Certificate of Service regarding financing	0.20	75.00	CMG
Mar-16-20		Review letter from Honda regarding Adversary Proceeding	0.20	75.00	CMG			Review memos to/from Mr. Kemp regarding crop incurrence	0.20	75.00	CMG
								Review Notice/Order regarding financing	0.10	37.50	CMG

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	Review memos to/from Mr. Kemp regarding crop insurance premium		0.10	37.50	CMG			Receipt and review of Notice of Deficiency; calendar deadline to file amended matrix, notice to added creditors and certificate of service re same		0.10	18.50	KLC	
	Assist CMG drafting Certificate of Service re Emergency Motion to Incur Debt		0.10	18.50	KLC		Apr-04-20	Review Helena response		0.35	131.25	CMG	
	Organize and supervise mailout of Emergency Motion to Incur Debt		0.20	37.00	KLC			Review FMC Proof of Claim		0.35	131.25	CMG	
Mar-27-20	Review Kubota Proof of Claim		0.25	93.75	CMG			Review Helena Proof of Claim		0.30	112.50	CMG	
	Review Community response		0.25	93.75	CMG		Apr-05-20	Review Honda demands		0.20	75.00	CMG	
Mar-28-20	Review memo from Jim Spencer regarding 365 Motion; review Helena Notice		0.25	93.75	CMG		Apr-06-20	Telephone conference with Mr. Kemp regarding loan process and Monday hearing		0.20	75.00	CMG	
Mar-30-20	Telephone conference with Mr. Kemp regarding crop insurance extension		0.10	37.50	CMG		Apr-08-20	Assist CMG drafting Answer, Objection to Community Bank's Motion to Abandon Collateral		0.40	74.00	KLC	
	Conference with Mr. Givens regarding First Security lawsuit and equipment location		0.25	93.75	CMG		Apr-09-20	Review Community Bank Motion and exhibits		0.85	318.75	CMG	
Mar-31-20	Telephone conference with Jim Spencer regarding Borrowing Motion and Helena lien		0.20	75.00	CMG			Dictation of Answer to Community Bank Motion		0.55	206.25	CMG	
	Review Order extending A.S.		0.20	75.00	CMG				Review memos to/from Jim spencer regarding Financing Order and 552 cutoff		0.10	37.50	CMG
Apr-01-20	Review Notice of CB hearing		0.20	75.00	CMG				Review and revision of Answer to Community Bank Motion		0.20	75.00	CMG
	Review order extending stay		0.20	75.00	CMG				Dictation of Financing Order		1.10	412.50	CMG
	Receipt and review of hearing notice re Community Bank's Motion to Abandon Collateral and Lift Stay; calendar hearing date and objection deadline to trigger preparation of hearing folder		0.15	27.75	KLC				Review John Deere Notice		0.10	37.50	CMG
	Assist CMG revising Schedules, SOFA		0.50	92.50	KLC				Review Notice regarding 341		0.20	75.00	CMG
Apr-02-20	Review and revision of Schedules and SOFA		2.15	806.25	CMG				Review memo from Jim Spencer accepting revised Order		0.10	37.50	CMG
	Assist CMG revising Schedules A/B, D		0.20	37.00	KLC				Receipt and review of Notice of Meeting of Creditors; calendar various deadlines		0.15	27.75	KLC
Apr-03-20	Review Notice of Deficiency		0.20	75.00	CMG				Assist CMG drafting Agreed Order re Motion to Incur Debt		0.20	37.00	KLC
	Review Deficiency Notice		0.10	37.50	CMG		Apr-10-20	Review Order regarding hearing time		0.10	37.50	CMG	

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	Review and revision of Financing Order		0.20	75.00	CMG			Assist CMG drafting letter to Kevin Kemp re Interim Order on Motion to Incur Debt		0.10	18.50	KLC	
	Review memo from Jim Spencer regarding Financing Order		0.05	18.75	CMG			Assist CMG drafting Certificate of Service re Interim Order on Motion to Incur Debt		0.10	18.50	KLC	
	Review file and court docket re: 4/13/20 hearing on Emergency Motion to Incur Debt; prepare hearing folder for same		0.30	55.50	KLC			Organize and supervise mailout of Interim Order on Motion to Incur Debt		0.10	18.50	KLC	
	Assist CMG revising Interim Agreed Order on Motion to Incur Debt		0.10	18.50	KLC			Organize and supervise mailout of Notice of Amendment to Schedules		0.20	37.00	KLC	
	Assist CMG drafting Notice of Amendment to Schedules and Certificate of Service re same		0.40	74.00	KLC	Apr-19-20		Update/preparation of document management control (subfiles and pleadings)		1.00	185.00	SLP	
Apr-11-20	Review Trustmark Proofs of Claim		0.45	168.75	CMG	Apr-20-20		Review CNH Proof of Claim (#12)		0.35	131.25	CMG	
Apr-13-20	Review memos to/from Jeff Rawlings, Jim Spencer regarding agreement to financing motion; Bankruptcy financing motion regarding reversal at final hearing		0.15	56.25	CMG			Dictation of letter to client regarding CNH Motion		0.20	75.00	CMG	
	Telephonic Hearing 364 Motion		0.20	75.00	CMG			Review memos to/from Mr. Kemp regarding loan, equipment payments and related issues		0.35	131.25	CMG	
	Review and revision of 364 Motion		0.10	37.50	CMG			Review letter from Trustee; dictation of letter to client regarding trustee documents to produce		0.25	93.75	CMG	
	Assist CMG revising Interim Order on Motion to Incur Debt		0.10	18.50	KLC			Dictation of letter to client regarding CNH Motion		0.20	75.00	CMG	
Apr-14-20	Telephone conference with Mr. Kemp regarding Order "cap" on loan advances		0.20	75.00	CMG			Review order regarding Disclosure Statement extension		0.20	75.00	CMG	
	Review and revision of Order regarding loan advances and "cap" draws		0.20	75.00	CMG			Review Notice of Hearing - CNH		0.20	75.00	CMG	
	Telephone conference with Rachel Lenoir regarding revised 364 Order		0.15	56.25	CMG			Receipt and review of hearing notice re CNH Industrial's Motion for Relief from Stay; calendar hearing date and objection deadline to trigger preparation of hearing folder		0.15	27.75	KLC	
	Review crop insurance Proof of Claim		0.20	75.00	CMG			Assist CMG drafting letter to Kevin Kemp re CNH's Motion for Relief from Stay		0.10	18.50	KLC	
Apr-16-20	Dictation of letter to client regarding approval of financing		0.10	37.50	CMG			Assist CMG drafting letter to Kevin Kemp re Trustee's letter requesting documents		0.10	18.50	KLC	
	Review CNH Proof of Claim		0.65	243.75	CMG	Apr-25-20		Review Notice of CNH Hearing		0.10	37.50	CMG	
	Receipt and review of Interim Order on Emergency Motion to Incur Debt; calendar final hearing date and objection deadline to trigger preparation of hearing folder		0.15	27.75	KLC	Apr-27-20		Review Trustee documents		1.00	375.00	CMG	

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Apr-29-20	Review John Deere and John Deere Financial Proof of Claim	0.45	168.75	CMG		Review and revision of plan filing extension papers	0.10	37.50	CMG
May-01-20	Review file and court docket re: 5/4/20 hearing on Community Bank's Motion to Abandon Collateral; prepare hearing folder for same	0.20	37.00	KLC	May-22-20	Review CFSC proofs of claim	0.65	243.75	CMG
May-02-20	Review memos to/from Jeff Rawlings regarding settlement	0.20	75.00	CMG	May-23-20	review memos to/from Les Alvis regarding John Deere collateral inspection	0.10	37.50	CMG
May-04-20	Dictation of letter to Mr. Kemp regarding Helena check	0.20	75.00	CMG	May-24-20	Dictation of motion for additional time to file Plan	0.40	150.00	CMG
	Assist CMG drafting letter to Kevin Kemp re Helena Chemical Check	0.10	18.50	KLC		Dictation of Notice regarding Plan Motion	0.20	75.00	CMG
May-05-20	Review Schedules and SOFA	0.35	131.25	CMG	May-26-20	Dictation of Certificate of Service regarding Notice regarding Plan Motion	0.15	56.25	CMG
	Telephone conference with Mr. Kemp regarding 341 prep	0.20	75.00	CMG		Review memos to/from J. Little regarding CNH Motion	0.20	75.00	CMG
	Attended 341	0.50	187.50	CMG		Review Notice regarding Telephonic Hearing	0.10	37.50	CMG
May-06-20	Review Community Bank Proof of Claim	0.25	93.75	CMG		Assist CMG drafting Motion for Additional Time to File Plan, Notice, Certificate of Service and Order re same	0.25	46.25	KLC
May-07-20	Review 341 minutes	0.10	37.50	CMG		Organize and supervise mailout of Motion for Additional Time to File Plan	0.25	46.25	KLC
May-08-20	Review Trustee response to CNH Motion to Lift	0.20	75.00	CMG	May-27-20	Dictation of letter to client regarding Monthly Operating Report	0.20	75.00	CMG
May-11-20	Review memos to/from ARM, Jim Spencer regarding 2019 crop checks	0.20	75.00	CMG		Assist CMG drafting letter to Kevin Kemp re MORs	0.10	18.50	KLC
May-12-20	Review CNH Motion	0.85	318.75	CMG	May-29-20	Review file and court docket re: 6/1/20 hearing on Emergency Motion to Incur Debt; update hearing folder for same	0.10	18.50	KLC
	Dictation of Answer to CNH Motion; review and revision of same	0.90	337.50	CMG		Review file and court docket re: 6/1/20 hearing on CNH Industrial Capital's Motion to Lift Stay; prepare hearing folder for same	0.25	46.25	KLC
May-18-20	Receipt and review of Trustee's Notice and Objection to Claim 20 of PHI Financial; calendar objection deadline	0.10	18.50	KLC	Jun-02-20	Telephone conference with client regarding hearing result	0.10	37.50	CMG
May-20-20	Dictation of Motion, Order, Notice and Certificate of Service regarding plan filing extension	0.55	206.25	CMG		Dictation of Order regarding CNH Motion; review and revision of Order regarding CNH Motion; dictation of memo to counsele	0.35	131.25	CMG

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	Dictation of Final Order on borrowing; review and revision of same	1.10	412.50	CMG		Receipt and review of Order Resetting Hearing re CNH's Motion to Lift Stay; calendar rescheduled hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Review memo from J. Jones and J. Little regarding Plan Order	0.10	37.50	CMG		Assist CMG drafting and revising Chapter 12 Plan	1.50	277.50	KLC
	Receipt and review of Order Resetting Hearing re CNH's Motion to Lift Stay; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC	Jun-13-20	Review and revision of Plan	0.75	281.25	CMG
	Assist CMG in drafting and revising Order on Motion to Lift Automatic Stay by CNH Industrial; assist CMG in drafting letter to Jarrett Little and Justin Jones re same; draft email to Little and Jones re same; ECF upload re same	0.50	92.50	SLP	Jun-14-20	Telephone conference with Mr. Kemp regarding Community Bank treatment in Plan	0.20	75.00	CMG
	Assist CMG in drafting and revising Final Order Granting Emergency Motion to Incur Debt; ECF upload re same	0.50	92.50	SLP	Jun-15-20	Telephonic Hearing regarding Community Bank Motion	0.15	56.25	CMG
						Finalize Plan	0.65	243.75	CMG
Jun-03-20	Review letter from Jeff Rawlings regarding reset of motion	0.10	37.50	CMG		Receipt and review of Notice & Order Setting Ch. 12 Confirmation Hearing; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	27.75	KLC
	Review hearing notice	0.20	75.00	CMG		Assist CMG in revising Plan of Reorganization	1.00	185.00	SLP
	Receipt and review of Order re CNH's Motion to Lift Stay; calendar deadline to file Plan and reminders	0.10	18.50	KLC	Jun-16-20	Telephone conference with Mr. Kemp regarding CNH values	0.20	75.00	CMG
Jun-04-20	Receipt and review of Notice of Telephonic Status Conference re Community Bank's Motion to Abandon; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC		Review memos to/from Jarrett Little regarding CNH inspection	0.10	37.50	CMG
Jun-07-20	Review Notice of Status Conference	0.20	75.00	CMG		Review memos to/from Jim Spencer regarding PDI at end of year one	0.10	37.50	CMG
Jun-08-20	Review memo and order regarding Community Bank Motion	0.25	93.75	CMG		Assist CMG drafting Certificate of Service re Plan & Notice & Order Setting Confirmation Hearing	0.20	37.00	KLC
Jun-11-20	Review Schedules and asset lists	1.00	375.00	CMG	Jun-19-20	Dictation of Certificate of Service regarding Plan hearing	0.20	75.00	CMG
	Dictation of first draft of Plan	1.75	656.25	CMG		Organize and supervise mailout of Plan and Notice & Order Setting Confirmation Hearing	0.20	37.00	KLC
Jun-12-20	Review Motion/Order regarding continuance	0.30	112.50	CMG		Assist CMG in drafting letter to Kevin Kemp re Notice and Order Setting Chapter 12 Confirmation Hearing; draft email to Kevin Kemp re same	0.15	27.75	SLP
	Telephone conference with Mr. Kemp regarding Plan provisions and values of collateral	0.15	56.25	CMG					

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Jun-20-20	Review memos to/from Sterling Kidd regarding resolving confirmation issues		0.25	93.75	CMG	Jul-13-20	Telephone conference with Les Alvis regarding value of collateral		0.20	75.00	CMG
Jun-22-20	Review memos to/from Mr. Kemp regarding government advance		0.20	75.00	CMG	Jul-14-20	Receipt and review of Trustee's Notice of Service of Discovery; calendar deadline to answer discovery and reminders		0.10	18.50	KLC
Jun-26-20	Review FMC Plan objection		0.20	75.00	CMG	Jul-15-20	Review Motion/Order/Notice of Hearing		0.35	131.25	CMG
Jun-29-20	Review Hearing Notice - Honda		0.20	75.00	CMG	Jul-16-20	Receipt and review of hearing notice re Trustee's Motion to Continue Confirmation Hearing; calendar hearing date to trigger preparation of hearing folder		0.10	18.50	KLC
	Review PHI claim withdrawal		0.25	93.75	CMG		Receipt and review of Order Granting Trustee's Motion to Continue Confirmation Hearing; calendar rescheduled hearing date to trigger preparation of hearing folder		0.10	18.50	KLC
	Receipt and review of hearing notice re Honda's Motion for Relief from Stay; calendar hearing date and objection deadline to trigger preparation of hearing folder		0.15	27.75	KLC		Receipt and review of Order Resetting Hearing re Honda's Motion for Relief; calendar rescheduled hearing date to trigger preparation of hearing folder		0.10	18.50	KLC
Jul-01-20	Review letter from USDA; review letter from Chapter 12 Trustee regarding USDA payments		0.20	75.00	CMG		Receipt and review of Order Resetting Hearing re Honda's Motion for Relief; calendar rescheduled hearing date to trigger preparation of hearing folder		0.10	18.50	KLC
Jul-02-20	review memos to/from S. Kidd regarding resolution of CFSC claim		0.20	75.00	CMG		Receipt and review of Order Resetting Hearing re Honda's Motion for Relief; calendar rescheduled hearing date to trigger preparation of hearing folder		0.10	18.50	KLC
Jul-06-20	Draft email to Kevin Kemp re Objection of Trustee to Plan		0.05	9.25	SLP		Receipt and review of Order Resetting Hearing re CNH's Motion for Relief; calendar rescheduled hearing date to trigger preparation of hearing folder		0.10	18.50	KLC
Jul-08-20	Review CNH objection		0.65	243.75	CMG		Receipt and review of Notice of Status Conference re various matters; calendar hearing date to trigger preparation of hearing folder		0.10	18.50	KLC
	Telephone conference with Mr. KEMP regarding CNH objection; repairs to confirm		0.85	318.75	CMG		Receipt and review of Notice of Status Conference re various matters; calendar hearing date to trigger preparation of hearing folder		0.10	18.50	KLC
Jul-09-20	Review Monthly Operating Reports (5)		0.75	281.25	CMG	Jul-20-20	Review Honda Motion		0.45	168.75	CMG
	Dictation of letter to Chapter 12 Trustee regarding Monthly Operating Reports		0.20	75.00	CMG		Dictation of answer to Honda Motion		0.25	93.75	CMG
Jul-10-20	Receipt and review of Order Resetting Hearing re CNH's Motion to Lift Stay; calendar rescheduled hearing date to trigger preparation of hearing folder		0.10	18.50	KLC		Review and revision of Answer to Honda Motion		0.10	37.50	CMG
Jul-11-20	Review CNH reset order		0.20	75.00	CMG		Telephonic Hearing		0.25	93.75	CMG
Jul-12-20	Review memos to/from Jeff Rawlings; review revised Community Bank Order		0.35	131.25	CMG		Review Reset Order		0.20	75.00	CMG
	Review 5th Circuit case on crop disasters		0.55	206.25	CMG		Assist CMG in drafting and revising Answer to Motion for Relief From Stay by Honda Finance Corp; ECF filing re same		0.35	64.75	SLP

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Jul-21-20	Review orders and resets; dictation of letter to client regarding same		0.10	37.50	CMG		Dictation of letter to client regarding John Deere Proof of Claim		0.20	75.00	CMG
	Assist CMG in drafting and revising letter to Kevin Kemp re John Deere Objection to Plan and Orders resetting a number of matters and Trustee's request for production of documents; telephone conference with Harold Barkely's office re request for production of documents; draft email to Kevin Kemp re same		0.25	46.25	SLP		Review memos to/from Laura Courtney regarding Honda MTLS		0.20	75.00	CMG
							Assist CMG in drafting letter to Kevin Kemp re Amended Proofs of Claim by Deere & Company; draft email to Kevin Kemp re same		0.15	27.75	SLP
Jul-23-20	Update/preparation of document management control (subfiles and pleadings)		2.00	370.00	SLP	Aug-21-20	Review file and court docket re: 8/24/20 hearing on Honda's Motion for Relief from Stay; prepare hearing folder for same		0.15	27.75	KLC
Jul-26-20	Review MTLS; Agreed Order: memos to/from Charles Barbour regarding Kubota Motion		0.75	281.25	CMG	Aug-24-20	Review Telephonic Hearing regarding Honda Motion		0.25	93.75	CMG
Jul-27-20	Receipt and review of hearing notice re Kubota's Motion for Relief from Stay; calendar hearing date and objection deadline to trigger preparation of hearing folder		0.15	27.75	KLC	Aug-25-20	Receipt and review of Order Resetting Hearing re Honda's Motion for Relief from Stay; calendar rescheduled hearing date to trigger preparation of hearing folder		0.10	18.50	KLC
Aug-09-20	Review memos to/from Les Alvis, Mr. Kemp regarding John Deere collateral values and related information		0.30	112.50	CMG	Aug-30-20	Telephone conference with Mr. Kemp regarding Honda offer.		0.20	75.00	CMG
Aug-14-20	Assist CMG drafting and revising Responses to Trustee's 1st Requests for POD		0.20	37.00	KLC		Dictate Honda Order, Dictate memo to L. Courtney confirming Honda Agreement.		0.25	93.75	CMG
Aug-17-20	Review Status Conference Notice		0.10	37.50	CMG	Sep-02-20	Dictate letter to client regarding Honda payment.		0.10	37.50	CMG
	Telephone conference with Mr. Kemp regarding status of crop Status Conference		0.20	75.00	CMG	Sep-03-20	Assist CMG in drafting letter to Kevin Kemp re Agreed Order Denying Honda's Motion for Relief From Stay; draft email to Kevin Kemp re same		0.15	27.75	SLP
	Review Notice regarding hearing conversion		0.10	37.50	CMG	Sep-08-20	Review Discovery.		0.25	93.75	CMG
	Review Reset Order		0.25	93.75	CMG		Dictate letter to Client regarding Discovery.		0.20	75.00	CMG
	Receipt and review of Order Resetting Hearing re Chapter 12 Plan; calendar rescheduled hearing date to trigger preparation of hearing folder		0.10	18.50	KLC		Assist CMG in drafting letter to Kevin Kemp re Trustee's Requests for Production of Documents; draft email to Kevin Kemp re same		0.20	37.00	SLP
	Receipt and review of Order Resetting Hearing re CNH Industrial's Motion to Lift Stay; calendar rescheduled hearing date to trigger preparation of hearing folder		0.10	18.50	KLC	Sep-16-20	Receipt and review of hearing notice re JPMorgan Chase's Motion for Relief from Stay; calendar hearing date and objection deadline to trigger preparation of hearing folder		0.15	27.75	KLC
Aug-18-20	Review John Deere Proof of Claim		0.65	243.75	CMG						

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Sep-17-20	Dictate letter to client regarding Honda Financial.		0.20	75.00	CMG		Oct-21-20	Review NADA valuation and memo from O. Spencer regarding the same.		0.20	75.00	CMG
	Review J.P. Morgan MTLS.		0.65	243.75	CMG		Oct-22-20	Review John Deere exhibit.		0.75	281.25	CMG
	Dictate Answer to JP Morgan MTLS		0.35	131.25	CMG			Review FMCC exhibit.		0.10	37.50	CMG
	Assist CMG in drafting letter to Kevin Kemp re Honda Finance Order; draft email to Kevin Kemp re same; assist CMG in drafting Answer and Response to Motion for Relief from Stay by JPMORGAN Chase Bank		0.30	55.50	SLP			Dictate notice of inability to confirm Plan; Review and revise same.		0.20	75.00	CMG
Sep-18-20	Assist CMG revising Answer to JPMorgan's Motion for Relief		0.10	18.50	KLC			Telephone conference with Les Alvis, Esq. re: values; review memo to/from Les Alvis confirming Agreement on values.		0.25	93.75	CMG
Oct-02-20	Receipt and review of Agreed Order Resolving Cat Financial's Objection to Plan; calendar deadline to file amended Plan		0.10	18.50	KLC			Review memos to/from J. Little re: settlement offers and issues.		0.40	150.00	CMG
Oct-08-20	Assist CMG drafting First Amendment to Plan		0.10	18.50	KLC			Review memo to/from J. Little re: exhibits, expert report and stipulation		0.20	75.00	CMG
Oct-13-20	Review September 2020 MOR.		0.25	93.75	CMG			Dictate memo to Clerk re: witness to appear		0.10	37.50	CMG
	Dictate Letter to Ch. 12 Trustee regarding September 2020.		0.15	56.25	CMG			Telephone conference with Mr. Kemp re: trial preparation and plan issues		0.25	93.75	CMG
Oct-14-20	ECF filing re September 2020 Monthly Operating Report, Response to Motion for Relief by JPMorgan Chase Bank and First Amendment to Chapter 12 Plan of Reorganization		0.15	27.75	SLP			Review file re: trial preparation - re: opening; direct and cross examination		1.00	375.00	CMG
Oct-19-20	Review memo from J. Spencer regarding value issue.		0.10	37.50	CMG			Review memos to/from O. Spencer re: collateral value		0.20	75.00	CMG
	Review memo from J. Spencer regarding possible settlement.		0.10	37.50	CMG			Review numerous memos to/from counsel re: inability to confirm plan		0.40	150.00	CMG
	Review memo from L. Alvis regarding settlement hearing.		0.10	37.50	CMG			Review memo/Order from S McNew on Chase motion		0.30	112.50	CMG
Oct-20-20	Review memos to/from O. Spencer regarding GMAC value.		0.25	93.75	CMG			Review memo from J. Jones approving Chase Order		0.10	37.50	CMG
	Telephone conference with L Alvis regarding value of collateral.		0.25	93.75	CMG			Review memos to/from J. Little re: settlement proposal; exhibits and stipulations		0.85	318.75	CMG
								Telephone conference with Les Alvis re: J Deere settlement		0.20	75.00	CMG
								Telephone conference with J. Little re: CNH Motion to Lift		0.25	93.75	CMG

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	Review file and court docket re: 10/23/20 hearing on CNH's Motion for Relief from Stay; update hearing folder for same		0.10	18.50	KLC	Jul-08-20 Jul-21-20 Oct-19-20 Oct-21-20 Oct-22-20 Oct-23-20	Long distance Pacer 5/1/20-7-10-20 Long Distance Long Distance Long Distance Long Distance Les Alvis - \$2.00 Parking Charge Court			2.13 0.60 2.13 4.13 2.00 2.00 7.50	
	Assist CMG drafting Notice of Inability to Confirm Plan and Certificate of Service re same		0.40	74.00	KLC						
Oct-23-20	Final Trial Preparation		0.20	75.00	CMG		Totals			\$464.02	
	Attended confirmation trial		2.50	937.50	CMG		Total Fee & Disbursements			\$28,345.02	
Oct-26-20	Receipt and review of Order Resetting Confirmation Hearing; calendar deadline to file amended plan and rescheduled hearing date to trigger preparation of hearing folder		0.15	27.75	KLC		Balance Now Due			\$28,345.02	
Oct-29-20	Review file; review and revise itemizations		1.00	375.00	CMG	Craig M. Geno	TIMEKEEPER	RATE	HOURS	AMOUNT	SUMMARY BY TIMEKEEPER
	Dicatape Application for Compensation; Notice and Certificate of Service		1.15	431.25	CMG	Kathryn L. Carter	\$375.00	61.35		\$23,006.25	
	Review and revise Application for Compensation; Notice and Certificate of Service		0.25	93.75	CMG	Sherry Lynn Purvis	\$185.00	19.10		\$3,533.50	
							TAX ID Number	45-4013160			
	Totals		87.70	\$27,881.00							

## **DISBURSEMENTS**

Jan-22-20	Long Distance client - \$3.13	3.13
Mar-02-20	Photocopies 48 pages @ .25/page	12.00
	Postage Mailout 7 @ .50	3.50
Mar-17-20	Long distance	2.13
Mar-20-20	COURTS/USBC-MS-S	275.00
Mar-26-20	Photocopies 79 pages @ .25/page	19.75
	Postage Mailout 6 @ .65	3.90
Apr-16-20	Photocopies 147 pages @ .25/page	36.75
	Postage to Wells Fargo	0.65
Apr-19-20	COURTS/USBC-MS-S	31.00
May-05-20	Long distance	1.13
May-26-20	Photocopies 23 pages @ .25/page	5.75
	Postage Mailout 6 @ .50	3.00
Jun-02-20	Long distance	2.13
Jun-12-20	Long distance	2.13
Jun-14-20	Long distance	3.13
Jun-19-20	Photocopies 120 pages @ .25/page	30.00
	Postage Mailout 13 @ .65	8.45